

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 05-11598-WGY
)	
CITY OF BOSTON,)	Three Judge Court: WGY, SL, PS
MASSACHUSETTS; THOMAS M.)	
MENINO, in his official capacity as)	
Mayor of the City of Boston;)	
BOSTON CITY COUNCIL:)	
MICHAEL F. FLAHERTY, PAUL J.))	
SCAPICCHIO, JAMES M. KELLY,)	
MAUREEN E. FEENEY,)	
CHARLES C. YANCEY, ROB)	
CONSALVO, JOHN TOBIN,)	
CHUCK TURNER, MICHAEL P.)	
ROSS, JERRY P. MCDERMOTT,)	
FELIX D. ARROYO, MAURA)	
HENNIGAN, STEPHEN J.)	
MURPHY; BOSTON ELECTION)	
DEPARTMENT; GERALDINE)	
CUDDYER, in her official capacity)	
as Chair of the Boston Election)	
Department,)	
)	
Defendants.)	
_____)	

**PLAINTIFF UNITED STATE'S OPPOSITION TO PROPOSED
INTERVENORS' MOTION TO INTERVENE AS PLAINTIFFS**

On July 29, 2005, the United States filed its Complaint in this action alleging that election practices and procedures in the City of Boston violate Sections 2 and 203 of the Voting Rights Act, 42 U.S.C. §§ 1973 & 1973aa-1a. Ten days after the United States entered into settlement negotiations with the City of Boston, the Chinese Progressive Association, the Chinatown Resident Association, City Life/Vida Urbana, Siu Tsang, Fung Yung, Yan Hui, and Maria Altreche (collectively, "Proposed Intervenors") filed a Motion to Intervene as Plaintiffs on

Friday, September 9, 2005. Shortly thereafter, the United States and the City finalized a settlement agreement, which was submitted to the Court on September 15, 2005.

Because the original parties have reached a settlement agreement that incorporates all of the relief sought by Proposed Intervenor and more, granting intervention would not enhance the resolution of the case, but rather complicate and delay the proceedings. Accordingly, Proposed Intervenor's Motion to Intervene should be denied.

This Opposition is based upon the supporting Memorandum of Law set forth below.

Respectfully submitted,

UNITED STATES OF AMERICA

By its Attorney,

MICHAEL J. SULLIVAN
United States Attorney

/s/ Damian W. Wilmot

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September 21, 2005

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CERTIFICATE OF SERVICE

I certify that on September 21, 2005, I caused a copy of the foregoing Opposition to be served on:

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